

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

April 5, 2013

MR BRUCE DAHLGREN
PLANT MANAGER
BUILDING MATERIALS CORPORATION OF AMERICA
2600 SINGLETON BLVD
DALLAS TX 75212-3738

Re: Permit Alteration
Permit Number: 7711A
Asphalt Roofing Facility
Dallas, Dallas County
Regulated Entity Number: RN100788959
Customer Reference Number: CN602717464
Account Number: DB-0378-S

Dear Mr. Dahlgren:

This is in response to your letter received January 7, 2013, requesting alteration of the conditions and maximum allowable emission rates table (MAERT) of the above-referenced permit. We understand your request to authorize planned startup and shutdown activities and emissions already represented in the permit. The request to include planned startup and shutdown activities and emissions cannot be approved at this time due to lack of information submitted. Specifically, a description of each of the planned shutdown activities, the duration and the calculations of the emissions from the planned shutdown activities is required before the planned startup and shutdown activities can be fully represented in the permit.

Upon review of the information submitted in your letter, we are unable to recommend approval of your request for a permit alteration.

Thank you for your cooperation in this matter. If you need further information or have any questions, please contact Mr. Stephen Anderson, P.E. at (512) 239-1287 or write to the Texas Commission on Environmental Quality, Office of Air, Air Permits Division, MC-163, P.O. Box 13087, Austin, Texas 78711-3087.

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Mr. Bruce Dahlgren
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April 5, 2013

Re: Permit Number: 7711A

This action is taken under authority delegated by the Executive Director of the Texas Commission on Environmental Quality.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Wilson", with a stylized flourish at the end.

Michael Wilson, P.E., Director
Air Permits Division
Office of Air
Texas Commission on Environmental Quality

MPW/sea

Enclosure

cc: Air Section Manager, Region 4 - Fort Worth
Section Manager, Air Pollution Control Program, City of Dallas Environmental and Health
Services, Dallas

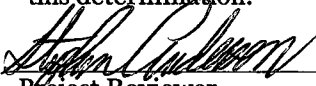
Project Number: 188007

Permit Alteration Source Analysis & Technical Review

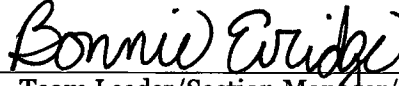
Company	Building Materials Corporation of America	Permit Number	7711A
City	Dallas	Project Number	188007
County	Dallas	Account Number	DB-0378-S
Project Type	Revision	Regulated Entity Number	RN100788959
Project Reviewer	Stephen Anderson, P.E.	Customer Reference Number	CN602717464
Site Name	Asphalt Roofing Facility		

Project Overview

The company has requested that their permit be revised to reflect the review of planned maintenance, startup and shutdown emissions. The request to include planned startup and shutdown activities and emissions cannot be approved at this time due to lack of information submitted. Specifically, a description of each of the planned shutdown activities, the duration and the calculations of the emissions from the planned shutdown activities is required before the planned startup and shutdown activities can be fully represented in the permit. This alteration request is not recommended for approval at this time. The company was informed by telephone on March 1, 2013 about this decision and they have no objections to this determination.


Project Reviewer
Stephen Anderson, P.E.

3/15/13
Date


Team Leader/Section Manager/Backup
Bonnie Evridge

4/5/13
Date



12770 Merit Drive | Suite 900 | Dallas, TX 75251 | P (972) 661-8100 | F (972) 385-9203

trinityconsultants.com

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Consultants

January 4, 2013

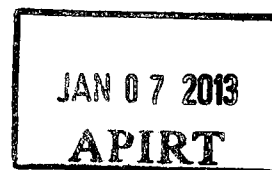
AIR PERMITS DIVISION

Air Permits Initial Review Team (APIRT)
Texas Commission on Environmental Quality - MC 163
12100 Park 35 Circle, Building C, Third Floor
Austin, TX 78753

JAN 07 2013

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RE: Permit Alteration Letter – TCEQ Permit No. 7711A
GAF Materials Corporation – Dallas Facility
Regulated Entity Number RN100788959
Customer Reference Number CN602717464



Dear Sir or Madam:

Building Materials Corporation of America doing business as GAF Materials Corporation (GAF) currently owns and operates asphalt roofing production facility located in Dallas, Texas (Dallas Plant) located at 2600 Singleton Blvd in Dallas, Texas. GAF has been assigned Texas Commission on Environmental Quality (TCEQ) Customer Reference Number (CN) CN602717464. The Dallas Facility currently operates under TCEQ Air Quality Account No. DB-0378-S and has been assigned TCEQ Regulated Entity Number (RN) RN100788959. The Dallas Plant operates under New Source Review (NSR) Permit No. 7711A and several Permit By Rule (PBR) authorizations.

BACKGROUND

Per 30 TAC §101.222(h), all facilities except those with oil and gas Standard Industrial Classification (SIC) codes are required to prepare (and submit as necessary) NSR permit authorization documentation to address emissions from planned maintenance, startup, and shutdown (MSS) equipment and activities within seven years of the effective date of the rule, or by January 5, 2013. This permit requirement is applicable to all planned and predictable MSS activities performed at any site that have not been previously authorized by the TCEQ. MSS activities that are performed in response to an emissions event, as defined in 30 TAC Chapter 101, are not subject to this permitting requirement.

With this permit alteration letter, GAF is requesting that the special conditions and maximum allowable emissions rate table (MAERT) contained in Permit No. 7711A be updated to include the MSS activities, such that the facility is in compliance with the upcoming deadline.

Emissions resulting from the MSS activities for combustion sources (as represented in Attachment 1) are considered indistinguishable from emissions resulting from normal operation of these sources. GAF requests that the permit be revised to reflect inclusion of MSS activities under the current permit allowable emission rates for these sources. In addition, GAF requests that a special condition be added to Permit No. 7711A stating that emissions resulting from MSS of these sources are indistinguishable from emissions resulting from normal operation of these same sources.

Emissions associated with filter replacement operations are authorized under PBR §106.263 - Routine Maintenance, Startup and Shutdown of Facilities, and Temporary Maintenance Facilities, which does not require

HEADQUARTERS >

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USA | China | Middle East

188007
7711A

registration with the TCEQ. GAF will comply with the requirements of this PBR and maintain authorization document on-site.

REGULATORY REVIEW

As shown below, this submission satisfies TCEQ requirements for a permit alteration as specified in 30 TAC §116.116(c).

116.116(c) Permit alteration.

(1) A permit alteration is:

(A) a decrease in allowable emissions; or

(B) any change from a representation in an application, general condition, or special condition in a permit that does not cause:

(i) a change in the method of control of emissions;

(ii) a change in the character of emissions; or

(iii) an increase in the emission rate of any air contaminant.

The incorporation of MSS emissions associated with the combustion sources into the special conditions and MAERT of Permit Number 7711A will result in a change to the special conditions in the permit. However, the requested alteration will not result in any change in the control of emissions, character of emissions, or emission rates since MSS emissions are considered indistinguishable from normal operation of these sources, and normal operations are currently authorized by Permit Number 7711A.

(2) Requests for permit alterations that must receive prior approval by the executive director are those that:

(A) result in an increase in off-property concentrations of air contaminants;

(B) involve a change in permit conditions; or

(C) affect facility or control equipment performance.

Since there are no proposed emissions increases for the combustion sources (or any physical changes to existing sources), there will be no increase in off-property concentrations. GAF is submitting this permit alteration letter to request approval from the executive director for the change in permit conditions associated with incorporating the MSS activities.

(3) The executive director shall be notified in writing of all other permit alterations not specified in paragraph (2) of this subsection.

The requested alteration is described above in paragraph (2). There are no other permit alterations being requested. As such, this requirement does not apply.



(4) A request for permit alteration shall include information sufficient to demonstrate that the change does not interfere with the owner or operator's previous demonstrations of compliance with the requirements of §116.111(a)(2)(C) of this title.

The requested changes will not interfere with previous demonstrations of compliance with the requirements of 30 TAC §116.111(a)(2)(C) – Best Available Control Technology (BACT).

(5) Permit alterations are not subject to the requirements of §116.111(a)(2)(C) of this title.

GAF understands that permit alterations are not subject to the requirements of 30 TAC §116.111(a)(2)(C) – Best Available Control Technology of this title.

If you have any questions or comments about the information presented in this letter, please do not hesitate to call me at (972) 661-8100 or Mr. Durwin Farlough of GAF at (214) 637-8977.

Sincerely,
TRINITY CONSULTANTS



Latha Kambham
Senior Consultant

cc: Ms. Alyssa Taylor, TCEQ Region 4 (DFW)
Mr. Durwin Farlough, GAF Materials Corporation



ATTACHMENT 1 - MSS ACTIVITIES ASSOCIATED WITH NSR PERMIT NO. 7711A

JAN 07 2013
APIRT

Summary of MSS Activities at GAF Dallas Plant

Emission Sources Authorized under NSR Permit No. 7711A																		
Equipment	EPN	FIN	CIN	Planned Maintenance Activities										Emission Calculation Basis	Comments	Authorization Mechanisms		
				Description	Procedures	Frequency	Total Duration		SUSD Duration (hr/activity)	Number of Units	Material Usage		Pollutants Emitted					
Combustion Devices																		
Standby Boiler	BLR5			Maintenance/Startup and Shutdown	-shutdown and startup for maintenance monthly -blowdowns everyday that do not cause air emissions	1 month	1	day	8 hrs /Startup	1	water		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
Thermal Oxidizer	8/BA			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - twice per year - Temperatures are slowly ramped up to the operating temperatures.	Semi annual	2	days	1hr /Startup		N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations. Emissions from tanks are not routed to Thermal Oxidizer is down for maintenance. However, the asphalt tanks are heated tanks and therefore, do not result in any additional emissions. GAF does not plan to conduct loading/unloading operations when the TO is down for maintenance.	Inherently authorized in NSR Permit No. 7711A.		
Superior Waste Heat Boiler	8A			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - twice per year	Semi annual	3	days	8 hrs /Startup	1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
Asphalt Heater	28			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - annually - Heater temperatures are slowly ramped up to the operating temperatures.	Annual	5	days	1-2 hrs /Startup	1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
TIA Tank Heater Burner	HTR3			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - annually - Heater temperatures are slowly ramped up to the operating temperatures.	Annual	5	days	1-2 hrs /Startup	1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
Self Seal Tank Heater	HTR4			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - annually - Heater temperatures are slowly ramped up to the operating temperatures.	Annual	5	days	1-2 hrs /Startup	1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
UIP Asphalt Preheater	HTR5			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - annually - Heater temperatures are slowly ramped up to the operating temperatures.	Annual	5	days	1-2 hrs /Startup	1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
Minestrina Oil Heater, Line #3 Stabilizer Htr.	HTR6			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - quarterly - Heater temperatures are slowly ramped up to the operating temperatures.	Quarterly	3	days	1-2 hrs /Startup	1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		
Waste Heat Recovery Boiler Natural Gas Burner Side	WHBLR1			Maintenance/Startup and Shutdown	Startup/shutdown for maintenance - twice a year - Heater temperatures are slowly ramped up to the operating temperatures.	Semi annual	3	days		1	N/A		Natural gas combustion emissions	N/A	Emissions from startup and shutdown are indistinguishable from normal operations	Inherently authorized in NSR Permit No. 7711A.		

